

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MONROE COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ASTRAZENECA PLC, PASCAL SORIOT, MARC
DUNOYER, and MENELAS PANGALOS,

Defendants.

Case No. 1:21-cv-00722-JPO

CLASS ACTION

Honorable J. Paul Oetken

VLADIMIR ZHUKOV, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

ASTRAZENECA PLC, PASCAL SORIOT, MARC
DUNOYER, and MENELAS PANGALOS,

Defendants.

Case No. 1:21-cv-00825-JPO

**VINOD ALLURI'S NOTICE OF NON-OPPOSITION TO COMPETING MOTIONS FOR
CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that on March 29, 2021, movant Vinod Alluri ("Movant") filed a motion pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 and Federal Rule of Civil Procedure ("Rule") 42(a), for an Order: (1) consolidating the above-captioned related securities class actions; (2) appointing Movant as Lead Plaintiff; and (3) approving Movant's selection of Roche Freedman LLP as Lead Counsel. *See* ECF No. 15. On that date, similar motions were filed by other members of the putative class in this action. *See* ECF Nos. 12, 18, 22.

The PSLRA provides a presumption that the “most adequate plaintiff” to represent the interests of class members is the person or group that, among other things, has “the largest financial interest in the relief sought by the class” and that “otherwise satisfies the requirements of Rule 23.” 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). Having reviewed the competing motions and supporting papers provided by the other movants seeking appointment as lead plaintiff, Movant does not appear to have the “largest financial interest in the relief sought by the class” as required by the PSLRA. Therefore, Movant provides notice that he does not oppose the competing motions for appointment as lead plaintiff. However, if the Court determines that the other lead plaintiff movants with losses larger than Movant are incapable or inadequate to represent the class in this litigation, Movant remains willing and able to serve as lead plaintiff or as a class representative.

This notice of non-opposition shall have no impact on Movant’s membership in the proposed class, Movant’s right to share in any recovery obtained for the benefit of class members, or Movant’s ability to serve as a representative party should the need arise.

DATED: April 5, 2021

Respectfully Submitted,

ROCHE FREEDMAN LLP

/s/ Constantine P. Economides

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Counsel for Vinod Alluri

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 5, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record.

/s/ Constantine P. Economides

Constantine P. Economides